

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Court’s Order regarding the parties’ and non-parties’ sealing and redaction requests, (Docket no. 1147), Plaintiffs respectfully move this Court to seal portions of Plaintiffs’ Proposed Findings of Fact and Conclusions of Law. The withheld information is derived from exhibits and deposition designations that were requested to be sealed in (1) the 33 non-parties’ Disclosure Objections, (*see* Docket no. 1147, at 2 n.1), and (2) Defendant Google’s Disclosure Objections, (Docket no. 985), as amended, (Docket no. 1142). The Court granted the sealing and redactions requests of the 33 non-parties and ordered Google to revise its requests for sealing and redaction, (Docket no. 1147). Subsequently, Google withdrew certain sealing and redaction requests, (Docket no. 1142), and has been meeting and conferring with Plaintiffs regarding its remaining disclosure objections.

Consistent with the local rules and this Court’s Electronic Case Filing Policies and Procedures, undersigned counsel have filed the materials at issue using the sealed filing event on CM/ECF and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The grounds for this motion are set forth in the accompanying memorandum of law. A proposed order is attached for the Court’s convenience.

Dated: August 19, 2024

Respectfully submitted,

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